



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Kathy Leathers  
Rural King Distribution and Management, Inc.  
701 S. West Street  
Route 130  
Olney, IL 62450

DEC - 5 2017

RE: MUR 7007  
Rural King Distribution  
and Management, Inc.

Dear Ms. Leathers:

On February 12, 2016, the Federal Election Commission ("Commission") notified Rural King Distribution and Management, Inc., of a Complaint alleging violations of the Federal Election Campaign Act of 1971, as amended. On November 7, 2017, based upon the information contained in the Complaint, and information provided by you, the Commission found that there is no reason to believe that Rural King Distribution and Management, Inc., violated 52 U.S.C. § 30118(a). Accordingly, the Commission has closed the file in this matter as it pertains to Rural King Distribution and Management, Inc.

The Commission reminds you that the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed. The Factual and Legal Analysis, which more fully explains the Commission's finding, is enclosed for your information.

If you have any questions, please contact Roy Q. Lockett, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Allen".

Mark Allen  
Assistant General Counsel

Enclosure  
Factual and Legal Analysis

1 **FEDERAL ELECTION COMMISSION**

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3 **FACTUAL AND LEGAL ANALYSIS**

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6 **RESPONDENT:** Rural King Distribution & Management, Inc.

**MUR: 7007**

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8 **I. INTRODUCTION**

9 This matter was generated based on a Complaint filed by Richard Stubblefield. As set  
10 forth below, the Federal Election Commission (the "Commission") finds no reason to believe  
11 that Rural King Distribution & Management, Inc. ("Respondent") violated 52 U.S.C. § 30118(a),  
12 a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"), by making a  
13 prohibited contribution.

14 **II. FACTUAL BACKGROUND**

15 The Complaint alleges that on December 31, 2015, Respondent, a corporation, made a  
16 prohibited \$2,700 contribution to Kyle McCarter for Congress Committee ("Committee"), the  
17 principal campaign committee for McCarter, who sought the Republican nomination in the 15th  
18 Congressional District in Illinois in 2016.

19 Rural King Distribution & Management, Inc. responds that it "had no participation in the  
20 campaign of Kyle McCarter for Congress Committee" and did not contribute "any monetary  
21 donations to [the McCarter] campaign."<sup>1</sup>

<sup>1</sup> Rural King Distribution & Management Inc. Resp. at 1 (Feb. 19, 2016).

**III. LEGAL ANALYSIS**

The Act and Commission regulations prohibit corporations from making contributions to candidate committees.<sup>2</sup>

The available record indicates that Rural King Distribution & Management, Inc. did not make the contribution at issue. Accordingly, the Commission finds no reason to believe that Rural King Distribution & Management, Inc. violated 52 U.S.C. § 30118(a).

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<sup>2</sup> 52 U.S.C. § 30118(a); 11 C.F.R. § 114.2(b), (d).